



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
17 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 17 2013

REPLY TO THE ATTENTION OF:
E-19J

Dennis Neitzke
Gunflint District Ranger
Superior National Forest
8901 Grand Avenue Place
Duluth, Minnesota 55808

Re: Draft Environmental Impact Statement for the South Fowl Lake Snowmobile Access
Project, Gunflint Ranger District, Superior National Forest, Cook County, Minnesota
EIS No. 20100308

Dear Mr. Neitzke:

The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (EIS) for the above-mentioned project in accordance with our responsibilities under the National Environmental Policy Act, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Draft EIS analyzes a replacement snowmobile trail between McFarland and South Fowl Lakes. The replacement trail is proposed because the existing route is unsafe due to dual use on the Arrowhead Trail and a steep descent down an unnamed trail, which is dangerous for two-way snowmobile traffic.

As stated in the Draft EIS, the USFS has an obligation to enhance recreational opportunities in the Superior National Forest (Forest). In an effort to reduce safety risks and enhance recreation on the Forest, the Draft EIS analyzes impacts from three action alternatives and a no action alternative.

The proposed action is Alternative 2. This alternative proposes construction of 2.2 miles of new trail between the two lakes, removing snowmobiles from roads. The Draft EIS adds to the analysis of a 2005 Environmental Assessment to analyze the effects of alternative snowmobile routes on sound in the Royal Lake area of the Boundary Waters Canoe Area

Wilderness (BWCAW). The analysis concluded that the type and frequency of sound would be the same among all alternatives since snowmobiles are present in the area surrounding Royal Lake under all alternatives and the use levels are not expected to vary by alternative.

Following a review of the Draft EIS and conversation between Peter Taylor, Project Coordinator, and Kathy Kowal of my staff, we have assigned a rating of “Environmental Concerns – Insufficient Information” (EC-2) to the Draft EIS. We recommend the Final EIS clarify the following language found in the Draft EIS.

Detailed Comments on the Wilderness Character Analysis

3.2.4–Analysis Parameters --- “Note on Figure 3-5 where the audible zone around McFarland Lake begins separating from the audible zone along the border. Snowmobiles can continue to run the border beyond that point meaning the audible zone continues.” This statement is confusing and should be clarified regarding how the analysis area was determined relevant to the trails.

3.2.5–Affected Environment --- “The Forest Plan indicates that the Superior National Forest may see an overall increase in snowmobile use and that may occur in the South Fowl area, however that is not related to the alternatives and there is no difference expected from any alternative.” The rationale for these statements should be included.

3.2.6–Direct and Indirect Effects to Wilderness from Sound --- “The measured value, rather than the calculated value, was used to determine the area of the wilderness affected by sound louder than the natural ambient dBA level.” This statement should explain the difference between measured and calculated values and why the measured value was used.

3.2.9–Conclusions Relating to Solitude Quality of Wilderness --- “MPCA (1999) reports that generally a 3 dBA change is the threshold for perceiving a change in sound. Therefore the impact on solitude...is rated as *negligible*. MPCA reports that a 5 dBA change is clearly noticeable. A 5 dBA change...is rated as a *minor* impact on solitude. Therefore the impact of the change in sound levels from Alternative 2 is rated as negligible to minor.” *emphasis added* These statements should be clarified regarding the derivation of these terms in relation to the MPCA reports.

3.2.9–Conclusions Relating to Solitude Quality of Wilderness --- “Alternative 2 audible sound duration of trail use would be less than No Action which could be considered a positive change (decrease). However the duration of sound above natural ambient (relative to No Action) is 2.1% for the most conservative case of single sled travel.” These statements should be clarified

regarding the No Action Alternative and Alternative 2 for sound above natural ambient versus audible sound and the distance of the two routes.

Detailed Comments on the Recreational Use and Safety Analysis

3.3.5–Direct and Indirect Effects --- “As with Alternative 1, the South Fowl Road and the unnamed trail would continue receiving OHV traffic, which would continue to be a legal snow-free access to South Fowl Lake. This traffic over federal property in Section 12 would constitute an approved OHV access trail and would be included on the Superior National Forest trail inventory.” This statement should be clarified regarding OHV safety and the unnamed trail deemed dangerous for two-way snowmobile traffic.

Detailed Comments on the Land Ownership Analysis

3.10.3–Analysis Parameters --- “The analysis area is the properties that are *crossed* by any of the trail alternatives since these ownerships might be affected by the construction of a snowmobile trail.” *emphasis added* This statement should be clarified regarding the scope of the analysis area.

Please send one copy of the Final EIS and Record of Decision (ROD) to my attention once it becomes available. We look to the Final EIS and ROD to disclose the rationale for selecting the final route. If you have any questions regarding the contents of this letter, please do not hesitate to contact me or Kathleen Kowal of my staff at (312) 353-5206 or via email at kowal.kathleen@epa.gov.

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosure

cc: Jim McDonald, Regional Environmental Coordinator